

Exhibit 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA**

TERPSEHORE MARAS,

Plaintiff,

v.

CHATTANOOGA NEWS

CHRONICLE, et al.,

Defendants.

Case No: 1:21-cv-317

DECLARATION OF ANGELO CARUSONE

I, Angelo Carusone, hereby declare:

1. I am over the age of 18 and otherwise competent to make this declaration.
2. The following facts are true of my own personal knowledge, except for any matters stated on information and belief, which I am informed and believe to be true.
3. I am President and CEO of Media Matters for America (“Media Matters”).
4. Media Matters has its principal place of business in Washington, DC and is incorporated as a 501(c)(3) non-profit in Washington, DC.
5. Media Matters does not maintain any offices in Tennessee.
6. Media Matters does not own any property in Tennessee.
7. Media Matters does not have any employees in Tennessee.
8. On November 20, 2020, Media Matters Published an article titled “Right-wing media feud erupts over Trump lawyer Sidney Powell’s bonkers election conspiracy theories.”
9. The article is one of national interest and does not mention the state of Tennessee or any activities in the state of Tennessee.

10. The author of the article, Eric Kleefeld, resides in New York and wrote and published the article in New York.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 4th day of March.



Angelo Carusone